

Exhibit 20

Deposition of Scott Coker

(August 3, 2017)

(excerpted)

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB-(PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF

SCOTT COKER

LOS ANGELES, CALIFORNIA

AUGUST 3, 2017

9:09 a.m.

REPORTED BY:
CYNTHIA K. DuRIVAGE, CSR #451
JOB NO. 51251

1 SCOTT COKER - HIGHLY CONFIDENTIAL
2 contract with a certain company, then that's who
3 you're obligated to fight for.
4 They weren't going to let any of those
5 athletes come over and fight, you know, in
6 Strikeforce, you know, or any other league.
7 So I think that -- to me, I don't think
8 that's unnatural.
9 **Q. Well, I think you testified earlier that**
10 **Strikeforce would allow its fighters --**
11 **A. Yes.**
12 **Q. -- to fight other promotions, right?**
13 **A. Yes.**
14 **Q. That didn't hurt Strikeforce's business,**
15 **did it?**
16 **A. That's correct. And that was something**
17 **that was really just my decision. In talking to the**
18 **fighters, it was something that was important to**
19 **them, so we granted them a hall pass to go and**
20 **compete in Japan.**
21 **Q. But did Strikeforce's decision to allow its**
22 **fighters to fight in other promotions make it more**
23 **difficult just for Strikeforce to run its business?**
24 **A. No.**
25 **Q. Did it impair Strikeforce's ability to be**

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1 **SCOTT COKER - HIGHLY CONFIDENTIAL**
2 **as successful MMA promoter?**
3 A. No.
4 **Q. And how did the -- just getting back to the**
5 **EA game, how did that game ultimately do**
6 **commercially, do you know?**
7 A. I'm not sure.
8 **Q. Were there fighters -- I'll withdraw that.**
9 **We talked a little bit this morning about**
10 **Affliction. Do you recall that testimony?**
11 A. Yes.
12 **Q. Okay. And I think you testified that there**
13 **came a time when Affliction stopped promoting mixed**
14 **martial arts events.**
15 **Do you recall that?**
16 A. Yes.
17 **Q. Do you recall approximately when Affliction**
18 **stopped promoting mixed martial arts events?**
19 A. 2009.
20 **Q. Let me -- do you recall -- withdraw that.**
21 **Did you communicate with Ms. Knapp about**
22 **Affliction's decision to stop promoting mixed martial**
23 **arts events?**
24 A. Yes.
25 [REDACTED]

<div>1</div> <div>86</div> <div>[REDACTED]</div>	<div>[REDACTED]</div>
<div>[REDACTED]</div>	<div>[REDACTED]</div>

23 (Pages 86 to 89)

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 11 BY MR. DELL'ANGELO:
 12 Q. So what makes a -- well, at least with
 13 respect to Cung Le, though, is it fair to say that
 14 his notoriety helped to make for a successful
 15 promotion when he was -- or a successful, I guess,
 16 bout when he was fighting?
 17 A. Yeah, I think -- I mean, I think Cung was a
 18 product of being a great martial artist, and he had a
 19 great promotion vehicle behind him.
 20 Q. And what is it, in your experience, that
 21 makes a successful pay-per-view event in the mixed
 22 martial arts?
 23 A. That the fighters are No. 1.
 24 Q. What do you mean No. 1?
 25 A. I mean, if you don't have the right

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1 SCOTT COKER - HIGHLY CONFIDENTIAL
 2 fighters to put them on pay-per-view, then you don't
 3 have a product to sell.
 4 Q. And what do you mean by the right fighters
 5 in that context?
 6 A. Again, it goes to -- you know, sometimes
 7 the personality outweighs the ranking.
 8 For instance, like Zuffa, they had a fight
 9 with the pro wrestler guy, not Brock but the other
 10 guy. I forgot his name. But he's never fought
 11 before, was trying to become a fighter, and he fought
 12 and it was a big draw because he had such a big
 13 following of fan base. So, you know, to me, it can
 14 kind of go -- you know, that can go both ways.
 15 (Exhibit 7 was marked for
 16 identification by the reporter.)
 17 BY MR. DELL'ANGELO:
 18 Q. Let's take a look back at Exhibit 7, the
 19 email that I've put before you there.
 20 A. Exhibit 7?
 21 Q. I'm sorry. I didn't actually hand you
 22 that.
 23 For the record, Exhibit 7 is a two-page
 24 series of emails spanning ZFL-2469204 through
 25 2469205.

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1 SCOTT COKER - HIGHLY CONFIDENTIAL
 2 Mr. Coker, would you take a look at
 3 Exhibit 7, and tell me if you recognize that
 4 document.
 5 A. That's pretty funny. I can't read the
 6 small print.
 7 Q. All right. So --
 8 A. I can -- I can comment on the first.
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
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[illegible]

25 (Pages 94 to 97)

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Q. Is that something that you viewed as being important to Strikeforce?

A. Yes.

Q. And why is that?

A. My goal was to build this company as big as we could, become a -- you know, a sizeable player in the mixed martial arts world.

And I felt like we had a lot of pieces in place. We started -- we started recruiting top talent, that we were building from the ground up with, say, like Ty Woodley, Luke Rockhold, Daniel Cormier, a lot of the stars that are currently stars today for the UFC.

We started building our free agent fighters. So we built the roster from the ground up and we bought some of the fighters from the top down. And I think that Fedor would have been the icing on the cake for us, you know, to just show the industry that, hey, these are real players, you can count on them, and they're going to be here for a long time.

Q. This email in Exhibit 7 is dated July 4, 2009, correct?

A. Yes, that's correct.

Q. Do you recall around that time frame, in

<p style="text-align: right;">102</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 2009, did Strikeforce acquire fighters from any other</p> <p>3 promotion?</p> <p>4 A. Yes.</p> <p>5 Q. And what promotion was that?</p> <p>6 A. In 2009, we acquired Pro Elite.</p> <p>7 Q. And what was Pro Elite?</p> <p>8 A. Pro Elite was a struggling mixed martial</p> <p>9 arts fight company based out of Los Angeles. They --</p> <p>10 well, at this time, we already had acquired them.</p> <p>11 This is prior to this.</p> <p>12 Q. Right. So the email in Exhibit 7 is</p> <p>13 sometime later in 2009, Strikeforce had already</p> <p>14 acquired Pro Elite?</p> <p>15 A. That is correct. And my thought, honestly,</p> <p>16 was in October of '10 -- I'm sorry -- October of '08</p> <p>17 is when we acquired Pro Elite.</p> <p>18 So that's my belief. So we acquired</p> <p>19 Pro Elite, which had the CBS, Showtime contracts. It</p> <p>20 had Nick Diaz' contract, Robbie Lawler's contract, it</p> <p>21 had Gina Carano's contract. So we acquired a lot of</p> <p>22 these great fighters at the end of '08.</p> <p>23 Q. How did the acquisition -- well, let me</p> <p>24 withdraw that.</p> <p>25 Did Pro Elite include any other MMA brands</p>	<p style="text-align: right;">104</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 momentum, income was pretty much -- those two years</p> <p>3 was pretty much like a hockey stick. In a down</p> <p>4 economic time, we were not impacted by the economy</p> <p>5 because we were still packing the stadium, we had</p> <p>6 great ratings, and we were putting butts in seats.</p> <p>7 When I think about that time period for</p> <p>8 Strikeforce, I think that it was a great time for the</p> <p>9 company because we had just acquired all these great</p> <p>10 fighters, we already had great fighters. We were</p> <p>11 buying more fighters, we were starting to build more</p> <p>12 fighters. And we had a great TV deal, and you know,</p> <p>13 once you added Showtime and CBS, Strikeforce became</p> <p>14 really a regional brand to become a national brand.</p> <p>15 Q. And was Strikeforce becoming a stronger</p> <p>16 competitor to the UFC at that time?</p> <p>17 A. Yes.</p> <p>18 Q. And was Strikeforce competing with the UFC</p> <p>19 for top talent at that time, that is, fighters?</p> <p>20 A. The only fighter that I would think that we</p> <p>21 were both after that we really wanted was Fedor.</p> <p>22 Q. In terms of -- in terms of top fighters?</p> <p>23 A. Because we had just acquired all these</p> <p>24 great fighters, and we only had so many TV dates.</p> <p>25 So, you know, the house is pretty full, if you can</p>
<p style="text-align: right;">103</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 that Strikeforce acquired?</p> <p>3 A. No, because it was not a purchase of the</p> <p>4 entire company, it was just an asset purchase. So we</p> <p>5 plucked out certain things that we wanted and left a</p> <p>6 lot of things that we didn't want.</p> <p>7 Q. How did Strikeforce's acquisition of</p> <p>8 Pro Elite impact Strikeforce's business?</p> <p>9 A. When you have great fighters, great</p> <p>10 personalities, a great TV deal, then you can get</p> <p>11 great sponsorships, and you know, that's what helps</p> <p>12 you drive your business.</p> <p>13 Q. Is it your view, then, that without things</p> <p>14 such as great fighters, you can't do those other</p> <p>15 things, like attract great sponsors, et cetera?</p> <p>16 A. It makes it very difficult.</p> <p>17 Q. How would you -- how would you characterize</p> <p>18 the -- I guess Strikeforce around the -- as an MMA</p> <p>19 promotion at the time of the Pro Elite acquisition?</p> <p>20 How would you characterize its trajectory in the MMA</p> <p>21 marketplace?</p> <p>22 A. Clearly, No. 2 in the marketplace. I mean,</p> <p>23 UFC had a 20-year, you know, first in market</p> <p>24 advantage.</p> <p>25 But I think we were gaining ground, gaining</p>	<p style="text-align: right;">105</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 understand what I mean by that.</p> <p>3 So we were looking for that one fighter</p> <p>4 that could make a big impact, and we wanted to get</p> <p>5 Fedor on our roster.</p> <p>6 Q. At that time, how would you characterize</p> <p>7 Strikeforce's heavyweight division?</p> <p>8 A. The thought behind getting Fedor, honestly,</p> <p>9 was to put together I mean arguably the greatest</p> <p>10 heavyweight tournament ever in the history of MMA,</p> <p>11 especially North America.</p> <p>12 And we already had Alistair Overeem, we had</p> <p>13 Fabricio Werdum, we had Josh Barnett. We had Brett</p> <p>14 Rogers. We had Big Foot Silva, and we had Andrei</p> <p>15 Arlovski.</p> <p>16 And I wanted to put Fedor on a roster so I</p> <p>17 could put him in this tournament because I knew that</p> <p>18 this was a tournament that was going to be a</p> <p>19 significant difference maker in our sport.</p> <p>20 Q. How did you think that Strikeforce's</p> <p>21 heavyweight division compared to the UFC's</p> <p>22 heavyweight division in 2009?</p> <p>23 A. Yeah. In 2009 and '10, we had more top 10</p> <p>24 rated heavyweights than the UFC did. So arguably, we</p> <p>25 had a better heavyweight division than they did.</p>

<p style="text-align: right;">110</p> <p>[REDACTED]</p> <p>17 MR. DELL'ANGELO: I think there's a way to</p> <p>18 shortcut this to some extent.</p> <p>19 I'm going to mark as Exhibit 8 video</p> <p>20 No. 23.</p> <p>21 (Exhibit 8 was marked for</p> <p>22 identification but replaced below by</p> <p>23 a different video clip.)</p> <p>24 BY MR. DELL'ANGELO:</p> <p>25 Q. So video No. 23 is a video dated</p>	<p style="text-align: right;">112</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 like this. We're not going to do like, you know, the</p> <p>3 companies were, we have to do one every month.</p> <p>4 UNKNOWN SPEAKER: Umm.</p> <p>5 SCOTT COKER: Or every other month.</p> <p>6 We're going to do pay-per-view when the</p> <p>7 fights are big enough and we feel like we have an</p> <p>8 event that's big enough to do pay-per-view. So</p> <p>9 whether that's twice a year or three times a year or</p> <p>10 once a year, we'll do more that month.</p> <p>11 UNKNOWN SPEAKER: There's no set.</p> <p>12 MR. COKER: There's no set.</p> <p>13 UNKNOWN SPEAKER: Okay.</p> <p>14 MR. COKER: We'll be like the boxing model.</p> <p>15 UNKNOWN SPEAKER: Okay.</p> <p>16 MR. COKER: So when the fights are, you</p> <p>17 know -- you know, being built up to the point where</p> <p>18 we should be doing it, then we'll do it. But we're</p> <p>19 not going to be forced into, you know -- because</p> <p>20 otherwise, I think it's becomes irrelevant.</p> <p>21 UNKNOWN SPEAKER: Yeah.</p> <p>22 MR. COKER: It's like you're doing it just</p> <p>23 to be doing it.</p> <p>24 UNKNOWN SPEAKER: Right.</p> <p>25 Mr. COKER: And is it really a pay-per-view</p>
<p style="text-align: right;">111</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 September 6, 2014, also available on YouTube. It's</p> <p>3 an interview with Mr. Coker with Ariel Helwani.</p> <p>4 So why don't I play that, and since this is</p> <p>5 publicly available, we can use this as a basis.</p> <p>6 A. Perfect. Okay.</p> <p>7 (Video clip played.)</p> <p>8 MR. COKER: We're going to stay with that,</p> <p>9 and that's work, and to me, it's like, look --</p> <p>10 THE REPORTER: Wait.</p> <p>11 (Video stopped.)</p> <p>12 MR. KELLY: Can we start over.</p> <p>13 MR. DELL'ANGELO: We're now playing</p> <p>14 Exhibit 8, which is an excerpt of a September 6, 2014</p> <p>15 interview of the witness, Mr. Coker, by Ariel</p> <p>16 Helwani.</p> <p>17 (Video clip played.)</p> <p>18 SCOTT COKER: We're going to stay with</p> <p>19 that, and that's work, and to me, it's like, look, if</p> <p>20 Chael Sonnen wins and Fedor wins, hey, he's already</p> <p>21 told me he wants to fight Fedor. So maybe that fight</p> <p>22 goes together. That's a pay-per-view worthy fight</p> <p>23 card.</p> <p>24 UNKNOWN SPEAKER: Yeah.</p> <p>25 SCOTT COKER: I mean fight. So to me, it's</p>	<p style="text-align: right;">113</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 worthy card, you know. That's really -- I don't want</p> <p>3 to be in that situation. I want to be in a situation</p> <p>4 where this is like boxing. When the fight is built</p> <p>5 up big enough, then we'll go for it.</p> <p>6 UNKNOWN SPEAKER: You look at it like</p> <p>7 Triple G and Danny --</p> <p>8 (Video stopped.)</p> <p>9 MR. DELL'ANGELO: I think the wrong video</p> <p>10 got played. I'm going to withdraw. Could we play</p> <p>11 15.</p> <p>12 This is a September 1, 2016 interview from</p> <p>13 The Fighter and The Kid. It's a continuation of the</p> <p>14 one that we marked earlier today.</p> <p>15 THE REPORTER: Is this Exhibit 8 now?</p> <p>16 MR. DELL'ANGELO: I'd like to make it</p> <p>17 Exhibit 8 if that's okay with everybody.</p> <p>18 MR. KELLY: Fine with us.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

<div>114</div> <div>1</div> <div>[REDACTED]</div>	<div>[REDACTED]</div>
<div>[REDACTED]</div>	<div>[REDACTED]</div>

30 (Pages 114 to 117)

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<div>1</div> <div>118</div> <div>[REDACTED]</div>	<div>[REDACTED]</div>
<div>[REDACTED]</div>	<div>[REDACTED]</div> <div>24 BY MR. DELL'ANGELO:</div> <div>25 Q. And so, what was the result of -- withdraw</div>

31 (Pages 118 to 121)

<p style="text-align: right;">122</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 that.</p> <p>3 What was the outcome of the meeting that</p> <p>4 you had with Lorenzo Fertitta, Ari Emanuel, and the</p> <p>5 lawyers who were present in late November 2010</p> <p>6 regarding the UFC's possible acquisition of</p> <p>7 Strikeforce?</p> <p>8 A. The outcome of the meeting was they threw</p> <p>9 out a number which we felt was ridiculous, and they</p> <p>10 left the room and said: Why don't you guys think</p> <p>11 about it. And CAA represented us, Brian Weinstein,</p> <p>12 Craig Jacobson was there, my lawyer, Stratton</p> <p>13 Sclavos, was there.</p> <p>14 We were there just to hear them talk, you</p> <p>15 know, hear what they had to say. After they threw an</p> <p>16 offer and said think about it, we just got up and</p> <p>17 left and went home.</p> <p>18 Q. And what number did the UFC put out there?</p> <p>19 A. I can't recall. It was like a single-digit</p> <p>20 number.</p> <p>21 Q. So was it in the order of millions of</p> <p>22 dollars?</p> <p>23 A. Oh, yeah, millions, yeah.</p> <p>24 Q. So it was a single-digit million?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">124</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 A. No.</p> <p>3 Q. Do you recall whether or not anyone on</p> <p>4 behalf of Strikeforce or the investors whom you've</p> <p>5 identified, do you recall whether or not any of them</p> <p>6 spoke to Mr. White about the UFC's possible</p> <p>7 acquisition of Strikeforce?</p> <p>8 MS. GRIGSBY: Objection, foundation.</p> <p>9 THE WITNESS: Yeah, I can only speculate.</p> <p>10 (Exhibit 9 was marked for</p> <p>11 identification by the reporter.)</p> <p>12 BY MR. DELL'ANGELO:</p> <p>13 Q. Let me show you what I've marked as</p> <p>14 Exhibit 9 to the deposition.</p> <p>15 For the record, Exhibit 9 is a one-page</p> <p>16 email, ZUF-00447778.</p> <p>17 [REDACTED]</p>
<p style="text-align: right;">123</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. Less than 10 million?</p> <p>3 A. Yes.</p> <p>4 Q. And then, did discussions between</p> <p>5 Strikeforce and the UFC resume at some point</p> <p>6 thereafter regarding the possible sale of Strikeforce</p> <p>7 to the UFC?</p> <p>8 A. Yes.</p> <p>9 Q. And do you recall approximately when that</p> <p>10 was?</p> <p>11 A. Stratton and Lorenzo kept talking.</p> <p>12 And then, Lorenzo, you know, he and -- you</p> <p>13 know, like they kept talking about the deal, what</p> <p>14 kind of deal.</p> <p>15 I had told my partner: Listen, I'm not</p> <p>16 interested, you know.</p> <p>17 And that went on from like November,</p> <p>18 December. I would say at some point, it stopped.</p> <p>19 And I'd say after January 1st, it picked back up.</p> <p>20 Q. And was Mr. White involved in any of the</p> <p>21 conversations, to the best of your knowledge?</p> <p>22 A. No.</p> <p>23 Q. Just so we're clear, you didn't speak to</p> <p>24 Mr. White about the UFC's acquisition or possible</p> <p>25 acquisition of Strikeforce?</p>	<p style="text-align: right;">125</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

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Q. Do you believe that it was necessary to make derogatory comments about the UFC in order to have a successful promotion at Strikeforce?

<p style="text-align: right;">130</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 A. No.</p> <p>3 Q. Did you believe that it was necessary to</p> <p>4 make derogatory comments about Dana White or other</p> <p>5 executives at the UFC in order to have a successful</p> <p>6 promotion at Strikeforce?</p> <p>7 A. No.</p> <p>8 Q. Did you believe that you needed to engage</p> <p>9 in the other types of conduct that the UFC engaged</p> <p>10 in, such as with respect to venues or sponsors at</p> <p>11 Affliction and Tapout that you testified about in</p> <p>12 order to have a successful MMA promotion at</p> <p>13 Strikeforce?</p> <p>14 MS. GRIGSBY: Objection to form, compound.</p> <p>15 THE WITNESS: No, it's just not my style of</p> <p>16 doing business.</p> <p>17 BY MR. DELL'ANGELO:</p> <p>18 Q. Notwithstanding whether or not it's your</p> <p>19 style, which I appreciate, did you think it was</p> <p>20 necessary for you to engage in that sort of behavior</p> <p>21 in order to have a successful promotion at</p> <p>22 Strikeforce?</p> <p>23 A. No.</p> <p>24 MS. GRIGSBY: Objection to form.</p> <p>25</p>	<p style="text-align: right;">132</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. Okay. Are there other fighters that you</p> <p>3 can think of that the UFC acquired from Strikeforce</p> <p>4 that went on to be contenders for a championship in</p> <p>5 the UFC?</p> <p>6 A. With Gregor Mushashi, Jacare Souza.</p> <p>7 The Cuban fighter, what's his name? I</p> <p>8 forgot his name. But he's pretty prominent right</p> <p>9 now.</p> <p>10 Q. How about Alistair Overeem?</p> <p>11 A. Yes. Alistair Overeem, Fabricio Werdum,</p> <p>12 Josh Barnett, Big Foot Silva.</p> <p>13 Q. That's Antonio Silva?</p> <p>14 A. I believe so. They're all named Silvas. I</p> <p>15 get confused.</p> <p>16 Q. How about Gilbert Melendez?</p> <p>17 A. Yes. Gilbert Melendez. Josh Thompson.</p> <p>18 Q. Did Gilbert Melendez go on to become a</p> <p>19 championship contender in the UFC?</p> <p>20 A. Yes.</p> <p>21 Q. He was acquired by UFC from Strikeforce?</p> <p>22 A. Yes.</p> <p>23 Cung Le.</p> <p>24 Q. And how about Dan Henderson?</p> <p>25 A. Yes, Dana Henderson got acquired.</p>
<p style="text-align: right;">131</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 BY MR. DELL'ANGELO:</p> <p>3 Q. So did there come a time when -- I think</p> <p>4 you've already testified, there came a time in March</p> <p>5 of 2011, correct, when Strikeforce acquired UFC --</p> <p>6 I'm sorry, withdraw that.</p> <p>7 I think you testified earlier that in March</p> <p>8 of 2011, Strikeforce was acquired by the UFC,</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. Do you recall -- how would you characterize</p> <p>12 the quality of fighters that the UFC acquired from</p> <p>13 Strikeforce?</p> <p>14 A. Substantial.</p> <p>15 Q. And do you recall -- or, withdraw that.</p> <p>16 Do you know if some of the fighters that</p> <p>17 the UFC acquired from Strikeforce went on to become</p> <p>18 champions at the UFC?</p> <p>19 A. Yes.</p> <p>20 Q. And who are you thinking of?</p> <p>21 A. Luke Rockhold, Ty Woodley.</p> <p>22 Q. Any others that you can think of?</p> <p>23 A. Robbie Lawler, Ronda Rousey, Nick Diaz.</p> <p>24 Daniel Cormier. Miesha Tate. Amanda Nunez.</p> <p>25 I think that's a pretty good list.</p>	<p style="text-align: right;">133</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. And he went on to be a championship</p> <p>3 contender in the UFC?</p> <p>4 A. Yes. In fact, I think his last fight was</p> <p>5 against Michael Bisping and he lost.</p> <p>6 Q. And who was Michael Bisping at the time of</p> <p>7 that fight?</p> <p>8 A. The current middleweight champion.</p> <p>9 Q. At the UFC?</p> <p>10 A. At the UFC.</p> <p>11 Q. And how about Tim Kennedy?</p> <p>12 A. Yes, Tim Kennedy, another contender.</p> <p>13 Q. And how about Yoel Romero?</p> <p>14 A. Yoel Romero, that's the Cuban gentleman I</p> <p>15 was referring to.</p> <p>16 Q. It's your understanding he went on to be a</p> <p>17 contender for the championship of UFC?</p> <p>18 A. Yes.</p> <p>19 Q. And was acquired by the UFC from</p> <p>20 Strikeforce?</p> <p>21 A. Yes.</p> <p>22 Q. And how about Paul Daley?</p> <p>23 A. Yes. I believe his contract with assigned,</p> <p>24 but it was a very short relationship. I don't think</p> <p>25 he stayed there long.</p>

<div>134</div> <div>[REDACTED]</div>	<div>[REDACTED]</div>
<div>[REDACTED]</div>	<div>[REDACTED]</div> <div>25</div>

35 (Pages 134 to 137)

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<p style="text-align: right;">138</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 BY MR. DELL'ANGELO:</p> <p>3 Q. To be clear, why were they not happy?</p> <p>4 A. Because the sale of Strikeforce impacted</p> <p>5 their fighters' income.</p> <p>6 Q. In a negative way or a positive way?</p> <p>7 A. In a negative way.</p> <p>8 Q. I'd like to play another short video clip</p> <p>9 for you.</p> <p>10 A. Okay.</p> <p>11 Q. This is taken from a June 18th, 2015</p> <p>12 interview with MMA Fighting on ESPN, also available</p> <p>13 on YouTube. I believe it was done in St. Louis,</p> <p>14 Missouri.</p> <p>15 I'm going to mark this as Exhibit 10.</p> <p>16 (Exhibit 10 was marked for</p> <p>17 identification by the reporter.)</p> <p>18 MR. DELL'ANGELO: Would the videographer</p> <p>19 please play video No. 4.</p> <p>20 (Video clip played.)</p> <p>21 UNKNOWN SPEAKER: Sure, but you would agree</p> <p>22 that things are different since the peak era of</p> <p>23 Strikeforce?</p> <p>24 MR. COKER: Well, I was just --</p> <p>25 UNKNOWN SPEAKER: It's just got to be --</p>	<p style="text-align: right;">140</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 you know, like it would unify some of these fighters</p> <p>3 into having, you know, who is really king of the</p> <p>4 hill, so to speak, or who is the best fighter.</p> <p>5 But I think that we had built our own</p> <p>6 audience, and Pride had built their own audience.</p> <p>7 All these companies had built their own audiences.</p> <p>8 And for some reason, it just didn't</p> <p>9 resonate, and I think that the industry at that time</p> <p>10 just kind of had a lull in it, you know, and I think</p> <p>11 people were, you know, disappointed that we had sold</p> <p>12 and disappointed that Pride had sold because they</p> <p>13 were fans of Pride, they were fans of Strikeforce.</p> <p>14 And maybe not necessarily a fan of the UFC.</p> <p>15 You could obviously be a fan of all three.</p> <p>16 Like myself, I would watch all three.</p> <p>17 But we had developed our own fan base to</p> <p>18 the point where they were fans of our own company.</p> <p>19 And so, when we went to -- when these</p> <p>20 fighters went over to the UFC, I don't think some of</p> <p>21 our fans went with them.</p> <p>22 And so, I think there was a lull, it was</p> <p>23 kind of -- and I think it took about a year to get</p> <p>24 out of that funk, you know, but I think the mixed</p> <p>25 martial arts industry was in a little bit of a funk</p>
<p style="text-align: right;">139</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 it's a lot harder to --</p> <p>3 MR. COKER: I will tell you this. After I</p> <p>4 sold Strikeforce, I think the industry went like</p> <p>5 this.</p> <p>6 (End of video clip.)</p> <p>7 BY MR. DELL'ANGELO:</p> <p>8 Q. So Mr. Coker, is that you depicted in the</p> <p>9 video?</p> <p>10 A. Yes.</p> <p>11 Q. And is that an accurate depiction of a</p> <p>12 comment that you made on or about June 18, 2015 to</p> <p>13 MMA fighting?</p> <p>14 A. Yes.</p> <p>15 Q. Tell me if I'm characterizing this</p> <p>16 incorrectly, but I think you're indicating the hand</p> <p>17 motion you made was in a downward direction; is that</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 Q. What did you mean by what you were saying</p> <p>21 as depicted in the video of Exhibit 10?</p> <p>22 A. To me, it was a surprise because, you know,</p> <p>23 one of the things that I had thought would happen in</p> <p>24 selling the company was like our champions would</p> <p>25 eventually fight their champions, and it would be,</p>	<p style="text-align: right;">141</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 at that time, in 2012.</p> <p>3 Q. When you sold -- well, you and your</p> <p>4 partners sold Strikeforce to the UFC in March of</p> <p>5 2013, did you need to sell Strikeforce?</p> <p>6 A. No.</p> <p>7 Q. Were there economic considerations with</p> <p>8 respect to the profitability of Strikeforce that</p> <p>9 necessitated a sale for some reason?</p> <p>10 A. No.</p> <p>11 Q. So why did you make the decision to sell</p> <p>12 Strikeforce?</p> <p>13 A. Well -- and you'll see this in the</p> <p>14 interview, and they asked me: If you had to do</p> <p>15 things all over again, what would you do different?</p> <p>16 And I said, well, I would have found a different</p> <p>17 partner, somebody that was in it for the long term</p> <p>18 and all the right reasons.</p> <p>19 And my partners are high-tech investors</p> <p>20 that weren't necessarily emotionally attached to</p> <p>21 Strikeforce. They saw a quick return from '08, when</p> <p>22 they invested, to 2010 or '11. They saw a quick</p> <p>23 return, and they didn't understand why I didn't get</p> <p>24 it. You know, they were like: What is wrong with</p> <p>25 you? And I'm like: No, I didn't want to sell it.</p>